

1 **NEXUS BANKRUPTCY**
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11 **UNITED STATES BANKRUPTCY COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**
13 **RIVERSIDE DIVISION**

In re:	Case No.: 6:21-bk-11329-SC
MICHAEL PAUL NEWMAN,	Chapter 7
Debtor.	Adv. No.: 6:21-ap-01071-SC
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CHLOE TAEKYEONG LEE,	JOINT EXHIBIT LIST
Plaintiff,	<u>Pre-Trial Conference</u>
v.	Date: October 31, 2023
MICHAEL PAUL NEWMAN,	Time: 9:30 AM
Defendant.	Courtroom 126

1 Plaintiff, Chloe Taekyeong Lee, and Defendant, Michael Paul Newman, hereby
2 submit the following list of exhibits which may be used a trial:

EX	DESCRIPTION	STIPULATED	OBJECTED	ADMITTED
1.	Accident report			
2.	1/6/2015 email from Lindy Park to NEWMAN with insurance information			
3.	6/15/2015 demand letter			
4.	Draft of complaint, dated 9/5/2015 prepared by NEWMAN			
5.	1/20/2016 email from NEWMAN to Lindy Park re: retainer			
6.	1/21/2016 email from Lindy Park to Allen Kim re: putting 15% in NEWMAN's retainer agreement			
7.	1/21/2016 letter from NEWMAN to insurance adjuster with retainer agreement			
8.	1/26/2016 letter from Lyons to Ponce			
9.	2/23/2016 email from insurance adjustor re: settlement acceptance			
10.	2/26/2016 email chain with draft of agreement between LEE and Arms Logistics			
11.	5% retainer agreement between NEWMAN and LEE			
12.	15% retainer agreement between NEWMAN and LEE			
13.	Draft One of agreements between LEE and Arms Logistics prepared by NEWMAN			
14.	Draft Two of agreements between LEE and Arms Logistics prepared by NEWMAN			
15.	3/16/2016 release of claims			
16.	3/16/2016 agreement between LEE and Arms Logistics			

EX	DESCRIPTION	STIPULATED	OBJECTED	ADMITTED
17.	3/28/2016 summary of expenses to be paid			
18.	7/11/2019 email from Hudrlik to NEWMAN			
19.	8/2/2016 NEWMAN's letter to LEE terminating representation (with attachments)			
20.	8/2/2016 email from LEE to NEWMAN re: fees			
21.	8/23/2016 letter from NEWMAN to LEE with refund from Collection Consultants			
22.	NEWMAN's bank statement reflecting payment of \$150,000 to NEWMAN from LEE's settlement funds			
23.	Insurance company notes from 2015			
24.	Insurance company notes from 2016			
25.	OMITTED			
26.	Summary of payments to NEWMAN by Caravan Canopy			
27.	Explanation charges, final bill, and lien forms provided to NEWMAN by Collection Consultants and Providence			
28.	5/19/2016 letter from NEWMAN to Providence re: reduction of bills			
29.	5/31/2016 letter from Providence to NEWMAN re: discount			
30.	5/31/2016 letter from NEWMAN to Providence with checks enclosed			
31.	7/29/2016 letter from NEWMAN to Collection Consultants/Providence re: amount billed			
32.	8/18/2016 letter from Collection Consultations to NEWMAN with a refund check			

EX	DESCRIPTION	STIPULATED	OBJECTED	ADMITTED
33.	4/7/2016 fax from NEWMAN to Collection Wizards requesting itemized final bill			
34.	4/7/2016 response letter from Collection Wizards to NEWMAN			
35.	3/28/2016 notice of lien sent to NEWMAN by Rawlings Company with forms and claim information			
36.	4/5/2016 letter from Rawlings to NEWMAN with summary of paid claims			
37.	4/27/2017 letter from NEWMAN to Rawlings Company re: reduction of bill			
38.	4/29/2016 letter from NEWMAN to Rawlings Company accepting discount			
39.	NEWMAN's responses to special interrogatories dated 12/15/2017			
40.	OMITTED			
41.	Letter from State Bar			
42.	Settlement Accounting			
43.	E-mail dated 02/26/2016 from Lindy Park			
44.	OMITTED			
45.	OMITTED			
46.	OMITTED			
47.	OMITTED			
48.	OMITTED			
49.	OMITTED			
50.	OMITTED			
51.	OMITTED			
52.	OMITTED			
53.	OMITTED			
54.	OMITTED			

EX	DESCRIPTION	STIPULATED	OBJECTED	ADMITTED
55.	OMITTED			
56.	Check #1002 from US Bank account #2449			
57.	ARMS's Accounting of \$130,000			
58.	OMITTED			
59.	Lee's Bank Statement from 08/19/2016 to 09/16/2016			
60.	OMITTED			
61.	OMITTED			
62.	Newman's Lease Application dated 4/12/2016			
STATE COURT ACTION				
63.	State Court Complaint			
64.	Transcript of State Court Trial: Volume One			
65.	Transcript of State Court Trial: Volume Two			
66.	Transcript of State Court Trial: Volume Three			
67.	State Court judgment and findings of fact			
68.	California Court of Appeals Decision			
69.	California Supreme Court Decision on Appeal			
STATE BAR ACTION				
70.	State Bar notice of disciplinary charges			
71.	NEWMAN's response to State Bar's disciplinary charges			
72.	NEWMAN's response to State Bar's disciplinary charges			
73.	State Bar's Pre-Trial Statement			
74.	State Bar and NEWMAN's stipulation as to facts and admission of documents			

EX	DESCRIPTION	STIPULATED	OBJECTED	ADMITTED
75.	NEWMAN's closing brief in State Bar action			
76.	State Bar Trial Transcript: Volume One			
77.	State Bar Trial Transcript: Volume Two			
78.	State Bar Trial Transcript: Volume Three			
79.	State Bar's Decision			

NEXUS BANKRUPTCY

Date: May 5, 2023

BENJAMIN HESTON,
Attorney for Plaintiff

LAW OFFICE OF DONALD REID

Date: May 5, 2023

DONALD REID,
Attorney for Defendant